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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

10 OCT 13 1994

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

In the Matter of)

Equal Access and Interconnection)
Obligations Pertaining to)
Commercial Radio Services)

CC Docket No. 94-54
RM-8012

REPLY COMMENTS OF WILTEL, INC.

I. INTRODUCTION

WilTel, Inc. ("WilTel") respectfully submits the following Reply Comments in the above-captioned proceeding.¹ Not surprisingly, the initial comments reveal sharp divisions regarding the need for equal access. However, the Commission should not be diverted by the cries of the opponents of equal access who, though more than willing to benefit from equal access as access consumers, rise up in indignation at the suggestion that they too, as access suppliers, should provide it. As WilTel emphasized in its initial comments, full and uniform equal access requirements are one of the Commission's most powerful tools to foster a telecommunications market characterized by multiple interconnected and competitive networks, increased service offerings, and lower prices.

¹See Equal Access and Interconnection Obligations Pertaining to Commercial Radio Services, Notice of Proposed Rulemaking and Notice of Inquiry, CC Docket No. 94-54, RM-8012, FCC 94-145 (July 1, 1994) ("CMRS NPRM").

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The most strenuous opposition to establishing equal access requirements, again not surprisingly, comes from those commercial mobile radio services ("CMRS") providers ("CMRSPs")² not currently subject to equal access requirements. The CMRSPs attempt to justify why they (and not their end users) are best suited to choose interexchange carriers ("IXCs") for those end users. CMRSPs' comments notwithstanding, consumer choice and merit-based competition are important Commission goals and should be fostered by full and uniform equal access requirements for all CMRSPs.³

II. EXPANDED LOCAL CALLING IS NO SUBSTITUTE FOR THE CONNECTIVITY AND COMPETITION FOSTERED BY EQUAL ACCESS

A number of CMRSPs contend that equal access will raise prices and deprive customers of desired features.⁴ The chief basis for this claim appears to be the belief that expanded local calling is the only means for lowering prices or that expanded local calling is intrinsically desirable to consumers

²As used by WilTel in these reply comments, the terms "CMRSP" and "CMRS" are limited to the cellular market and services potentially competitive with cellular services, including personal communications services ("PCS") and enhanced (or wide area) specialized mobile radio ("ESMR") services.

³WilTel's emphasis on equal access in these reply comments is not intended to suggest that the broad goals of maximizing interconnection and resale in the wireless markets are unimportant. Without equal access, however, Commission efforts to foster competition will be inadequate.

⁴See, e.g., Comments of Cellular Telecommunications Industry Association at 11; Comments of GTE Service Corporation at 10 n.9; Comments of Telephone and Data Systems, Inc. at 13.

even if it results in diminished competition and raises consumers' overall telecommunications bills.

In spite of the glowing rhetoric which surrounds expanded local calling, it is important that the Commission recognize these plans for what they are and what they are not. Clearly they are not a "network of networks" -- any more than a landline LEC's expansion of its grip on consumers by redefining what constitutes a local call (on its own network) amounts to an improvement of customer access to alternative carriers.⁵ What these plans are (as clearly seen in the landline context) is an effective tool designed to prevent competition.

Absent equal access provisions, expanded local calling areas will be only as competitive as the CMRS market for those areas. As demonstrated by WilTel and others, that is simply not enough. First, as the CMRS NPRM acknowledged, lower costs for CMRSPs (e.g., for interexchange service) do not "necessarily translate into lower prices for the end user."⁶ Second, under equal access the economies of scale allegedly only available where a CMRSP is allowed to strike an exclusive deal with an IXC will be available directly to end users using equal access through the (comparatively) competitive

⁵Even where expanded local calling has been achieved through arrangements with other carriers, it simply does not offer end users the connectivity to competing networks that would be brought about by uniform equal access.

⁶CMRS NPRM ¶ 41.

interexchange market, which, as the Commission is aware is characterized by a healthy resale market. Thus the competition permitted by equal access can be expected to drive both local and long distance prices down. In addition, the increased consumer choice permitted by a true network of networks will have enduring consumer benefits in terms of both service offerings and price. The de minimis burden of dialing the digit "1" is far outweighed by these real benefits.⁷

CMRSPs can serve customers beyond local areas under equal access; they will, however, be required to compete for them on a level playing field. Equal access -- including its associated unbundling of local and long distance portions of service⁸ -- is the only means to achieve such a result.

III. CLAIMS THAT CONSUMERS DO NOT DESIRE EQUAL ACCESS ARE MISGUIDED

Related to the CMRSPs' claim regarding consumer desire for expanded calling areas is their claim that end users do

⁷The claim by some parties that a speed-dial coding of either 800 or 10XXX interexchange carrier access numbers is an adequate substitute for 1+ access is without support. As an initial matter, once an 800 number is dialed a customer must still use access codes. Further, a customer using the CMRSP as its IXC would not be required to utilize such an access method, thus giving the CMRSP a significant competitive advantage. Finally, consumers are familiar with and expect 1+ access. Resistance to more cumbersome methods of access can be expected.

⁸See Memorandum of United States in Response to Motions for Generic Wireless Waivers at 37-38, United States v. Western Elec., Inc., Civil Action No. 82-0192 HHG (D.D.C.) (filed July 25, 1994) ("DOJ Comments").

not desire equal access.⁹ To the extent that claim is even accurate, it does not address the fact that consumers do desire lower prices and increased choice of services. Equal access is undeniably the route to those benefits. The experience in the landline context dramatically demonstrates this fact. That consumers may not know that lower prices and increased options are the result of equal access does not render those benefits illusory or undermine the need for equal access.

IV. EQUAL ACCESS IS NECESSARY BOTH BECAUSE OF THE CURRENT STATE OF COMPETITION OF THE CMRS MARKET AND BECAUSE EQUAL ACCESS IS ESSENTIAL TO FUNDAMENTAL COMMISSION GOALS

A. The CMRS Market

A number of the commenting parties express confidence that the CMRS markets are, or at least soon will be, sufficiently competitive to preclude the need for equal access requirements.¹⁰ Such optimistic assumptions, however, are no substitute for hard analysis. That analysis demonstrates that the cellular market is not competitive and the significance of other emerging forms of CMRS is speculative at best.¹¹

⁹See, e.g., Comments of ALLTEL Mobile Communications, Inc. at 6; Comments of Comcast Corporation at 27-28; Comments of Century Cellunet, Inc. at 10.

¹⁰See, e.g., ALLTEL Mobile Communications, Inc. at 2; Comcast at 39 (Commission should at very least defer establishing equal access until clearly necessary); Nextel Communications, Inc. at 7 n.7.

¹¹See DOJ Comments at 14-22.

Further, arguments that there is (or will be) no bottleneck at the wireless local level ignore the difference between local access (for other carriers and service providers) to end users and the local service provided directly to those end users. It is simply wrong to assume that because an end user has a choice of local wireless carriers, an IXC has multiple means of access to that end user; once the end user has selected a local wireless carrier, an IXC has only one way of reaching that wireless end user, through the wireless carrier selected. It is the control of that bottleneck that CMRSPs can and will use to their economic advantage (and to the ultimate detriment of competition and telecommunications consumers) unless equal access rules require otherwise.

B. Equal Access Promotes Fundamental Commission Goals

Arguments that equal access is a historical anachronism inextricably tied to the MFJ¹² also fail to recognize that the principles underlying equal access transcend any particular market structure and in fact embody fundamental Commission goals.¹³

¹²United States v. American Tel. & Tel. Co. ("MFJ" or "Modification of Final Judgment"), 552 F.Supp. 131, 228 (D.D.C. 1982), aff'd sub nom. Maryland v. United States, 460 U.S. 1001 (1983).

¹³Comments of WilTel at 3-5; cf. Comments of AT&T at 5 ("[T]hese consumer benefits [from equal access] are so significant that it is no longer necessary or appropriate to consider them as merely means to stimulate competition in certain markets or businesses."); Comments of DCR

WillTel recognizes that it is tempting to characterize equal access as an artifact of the antitrust break-up of the Bell system. However, the origins of equal access should not obscure its value as an essential mechanism for establishing and maintaining a vibrant, competitive telecommunications network as the industry structure continues to evolve. Indeed, the basic precepts of equal access -- non-discriminatory interconnection, pricing, and choice of carriers -- have just as much value in a market composed of vertically integrated carriers as in one composed of IXC's and LEC's.

In the present context the import of equal access is clear. Without equal access, CMRSPs will be able to leverage their market power (and provide points of release for the market power of others) into ever widening non-competitive "local" calling areas. Isolated pools of service with single-source interexchange service will expand with no assurance they will ever be connected to (and thus disciplined by) competitive networks.

WillTel urges the Commission to prevent the development of the wireless market in such a fashion and to acknowledge the continuing utility and importance of equal access to its basic goals.

Communications, Inc. at 5 (characterizing equal access requirements as a guarantor of network connectivity).

V. THE COMMISSION MUST IMPLEMENT FULL AND UNIFORM EQUAL ACCESS REQUIREMENTS

To the extent CMRSPs do not oppose equal access requirements in their entirety, they urge the Commission to exempt certain classifications of CMRSPs or otherwise limit the uniformity and scope of equal access requirements to be implemented.¹⁴ Other parties, however, rightly recognize the importance of uniform and full requirements.¹⁵ WilTel does not endorse the concept of "regulatory parity" as a general end in itself disengaged from market and policy analyses. However, in this instance the goals of equal access are so fundamental and the risk of discrimination so high that it is essential that the market not be permitted to develop without such requirements.

WilTel believes that the equal access requirements developed by the Department of Justice in the McCaw/AT&T merger consent decree¹⁶ and its comments on the BOC petition

¹⁴See, e.g., Nextel Communications, Inc. at 12 (discussing phase-in of ESMR equal access requirements); Comments of Point Communications Company at 4 (discussing small carrier phase-in); Comments of The Organization for the Protection and Advancement of Small Telephone Companies at 4 (discussing exemption of rural carriers).

¹⁵See, e.g., Comments of California Public Utility Commission at 2-3 (endorsing equal access requirements for cellular carriers and competitors of cellular service); Comments of New York Department of Public Service at 1-2.

¹⁶United States v. AT&T Corp., Civil Action No. 94-01555, United States Dept. of Justice Proposed Final Judgment, July 15, 1994.

to resell interexchange service to wireless customers¹⁷ can serve as a useful basis for equal access requirements in the CMRS context. Those provisions include:

- 1+ access to interexchange carriers,
- local service areas coextensive with LATAs,
- nondiscriminatory access to billing and customer information,
- balloting and allocation, and
- mandatory unbundling of interexchange and local services.¹⁸

Finally, the implementation period for equal access should be as brief as reasonably possible. A number of parties observe that most cellular switches are already equal access capable.¹⁹ As Rochester notes, the Commission should treat any request for waiver of equal access requirements for reasons of technical limitations "with a healthy degree of skepticism."²⁰ WilTel continues to believe that an implementation schedule that mirrors that afforded McCaw under

¹⁷See supra note 8.

¹⁸WilTel agrees with AT&T that in order for the Commission to properly monitor its implementation, equal access informational tariffs should be required of CMRSPs. See Comments of AT&T at 12 n.18. However, WilTel believes that how long such tariffs should be required is an empirical question that the Commission should not attempt to address in advance.

¹⁹See Comments of MCI Communications, Inc. at 4; Comments of New York Department of Public Service at 3.

²⁰Comments of Rochester Telephone Corporation at 6 (noting that the implementation of equal access in the wireless context has already been achieved for BOC-affiliated cellular carriers.)


the consent decree represents a more than reasonable accommodation of any implementation concerns of CMRSPs.

VI. CONCLUSION

The Commission should resist calls from commercial mobile radio service providers to abandon equal access requirements. Such a course would allow the development of fragmented service systems and deprive end users of the benefits of competition that already exist. Equal access has the potential to play a pivotal role in the development of a telecommunications market characterized by vigorous competition and consumer access to multiple interconnected networks. The Commission should take this opportunity to establish the ground rules for such a future.

Respectfully submitted,
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